August 2, 2011

Mr. W. Owen Thompson
Remedial Project Manager
Superfund Remedial Response Section Seven
U.S. EPA Region 5, SR-6J
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Chicago, IL 60604
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Subject: Additional Excavation of DS Tributary Work Plan (Revised)
Detrex Source Control Area – Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is submitting this Work Plan for additional excavation of a portion of the DS Tributary west of the State Road bridge crossing. Per our conversation on Monday, June 6, 2011, Detrex is submitting this Work Plan for review by the United States Environmental Protection Agency (USEPA) prior to implementation.

BACKGROUND

In November 2009, Detrex performed a limited sediment removal in the area of the DS Tributary immediately west of State Road. As part of this work effort, a total of approximately 47 cubic yards of sediment / soils were removed and disposed of off-site. In April 2011, Detrex was notified by FBAG that a sheen and DNAPL material was observed within the gravel backfill in the same general area. On April 29, 2011, URS and Detrex personnel completed a visual inspection of the DS Tributary, both upstream and downstream of the area where the DNAPL re-appearance was reported (see **Figure 1**). Sampling results were reported to USEPA on May 24, 2011.

As a result of the re-appearance of DNAPL in this area, Detrex is proposing to perform additional excavation of sediment and soils west of the State Road bridge crossing. A review of data provided in the Sediment and DNAPL Delineation Report submitted to USEPA in May 2010 and existing conditions indicate that the source of DNAPL is related to either impacted subsurface soils in the DS Tributary stream channel or material that potentially remains beneath the concrete culvert under State Road. Sampling results from sediment locations upstream along with visual results indicates that DNAPL is not migrating from the east side of State Road.

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SCOPE OF WORK FOR ADDITIONAL EXCAVATION

Detrex will perform an additional excavation of sediments and soils in the DS Tributary in the area where DNAPL impacted materials have been identified. The area of proposed excavation is shown on Figure 1. As part of the additional excavation work to be performed in this area, the following work will be performed.

- Initial elevation survey of DS Tributary channel west of State Road to establish existing elevation of stream banks and channel surface.
- Install sand bags and stream water diversion equipment in culvert beneath State Road for water by-pass during excavation. Water by-pass will be installed along 200 ft. of the channel in the proposed excavation area.
- Construct decontamination area and staging area for roll off boxes adjacent to the DS Tributary channel. A temporary decontamination pad will be constructed to remove large debris / soil on equipment, wash equipment and provide for collection of decontamination liquids. All liquids generated will be collected and treated at the Detrex site.
- The proposed area for additional soils excavation will begin at the western edge of the State Road culvert and proceed downstream approximately 125 feet. The excavation will extend across the entire width of the DS Tributary (approx. 10-15 ft.). The actual excavated width will be determined based on field observations and screening at the time of the excavation. At this time, it is proposed to excavate all materials in this area that contains free liquid DNAPL. The excavation will be limited to no deeper than 6 ft.-bgs (see **Figure 2**).
- The excavation will be monitored using a PID. Also, if liquid DNAPL is discovered along the sidewalls, further excavation will be required. An attempt will be made to excavate beneath the concrete culvert underneath State Road to evaluate the presence of DNAPL beneath the culvert.
- Backfilling of the excavation will not occur before the excavation bases and sidewalls have been open for at least 2 hours to allow for the presence of liquid DNAPL to be observed.
- Upon completion of the excavation, the area will be backfilled and restored to the existing elevations and channel shape. The excavation will be backfilled using the following materials:
    - Approximate 2 foot thickness of low permeability bentonite Aquablok® (See attached information).
    - Approximate 2 foot thickness of clean clay compacted in place, with a non-woven geotextile fabric placed on top of the clay and keyed into existing side walls.

  - Approximately 18 inches of ODOT 50 stone (i.e. gravel rip-rap) along channel re0nforced with a flowable fill / cement grout surface to create a final channel surface (see **Figure 2** for backfill details).

- All excavated soils will be placed in roll off containers.
- During our call, Detrex requested USEPA to consider placement of excavated soils within the Detrex Source Area, as described in the Recovery Well Work Plan. Please advise if acceptable; otherwise, materials will have to be disposed of off-site. NO
- Final elevation survey of DS Tributary channel west of State Road to verify final restored elevations.
- Preparation of a letter report describing excavation activities, as-built drawings, and field results/observations, as appropriate.

SCHEDULE

Once USEPA has reviewed the Scope of Work for additional excavation of sediment / soils in the DS Tributary channel area west of State Road, Detrex would like to implement the work as soon as possible. After Detrex has received your comments on this Work Plan, we will submit the USEPA approved Scope of Work to SunPro who was involved with the work in 2009, to obtain a bid response. We anticipate the project can be completed within two to three weeks from the date of USEPA's approval, pending favorable weather conditions.

If you have any questions regarding this submittal, please do not hesitate to contact me at 216-622-2432 at your convenience.

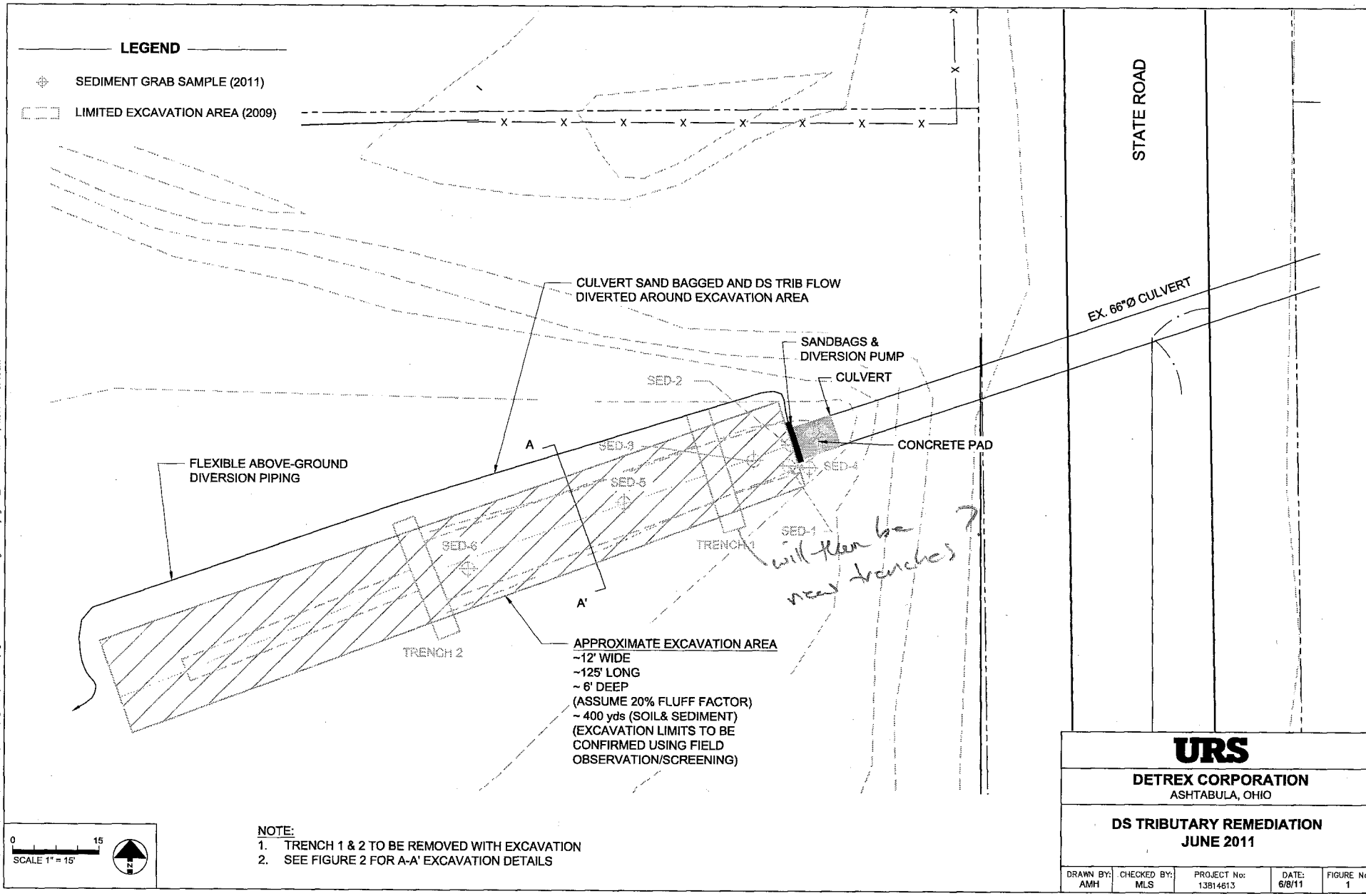
Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.
Vice President

Enclosure

cc: R. Currie – Detrex Corporation
T. Steib – Detrex Corporation
T. Doll - Detrex Corporation
R. Williams – Ohio EPA
W. Earle - SulTRAC



NOTE:
1. TRENCH 1 & 2 TO BE REMOVED WITH EXCAVATION
2. SEE FIGURE 2 FOR A-A' EXCAVATION DETAILS

URS

DETREX CORPORATION
ASHTABULA, OHIO

DS TRIBUTARY REMEDIATION
JUNE 2011

DRAWN BY:	CHECKED BY:	PROJECT No:	DATE:	FIGURE No:
AMH	MLS	13814613	6/8/11	1

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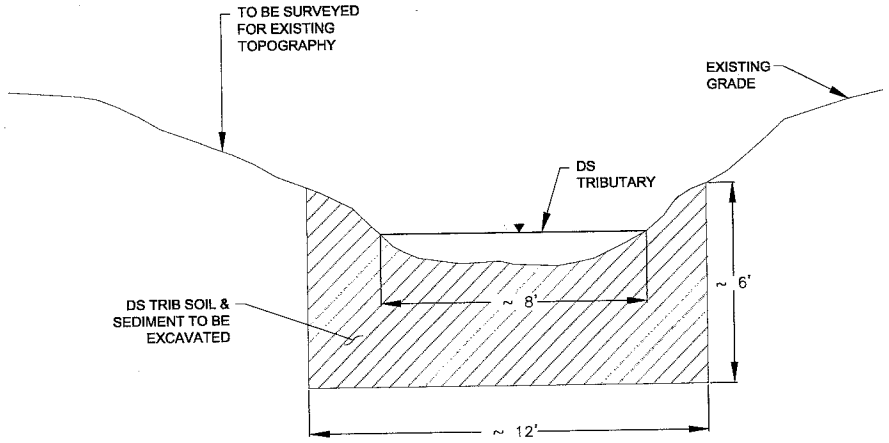
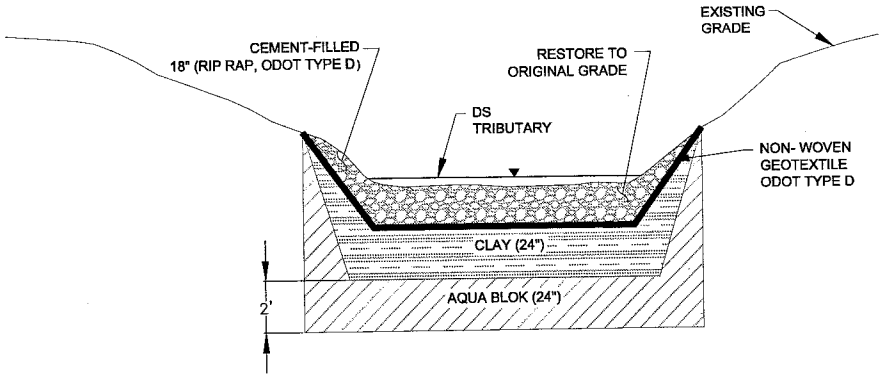


DETAIL 1:
EXCAVATION PLAN



DETAIL 2:
RESTORED PLAN

DETAIL 3:
ELEVATION THROUGH
CENTERLINE OF CULVERT

AS SHOWN

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ASHTABULA, OHIO

DS TRIBUTARY REMEDIATION
EXCAVATION DETAILS
JUNE 2011

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